

Commonwealth of Kentucky
Division for Air Quality
EXECUTIVE SUMMARY

PROPOSED

Title V Renewal Construction / Operating Permit

Permit: V-05-043 Revision 1

Kentucky Utilities Company - Ghent Station

Ghent, KY 41045

July 30, 2007

Ben Markin, Reviewer

SOURCE ID: 21-041-00010

SOURCE A.I. #: 704

ACTIVITY ID: APE20040002

DESCRIPTION

Kentucky Utilities (KU) was issued a draft Title V renewal permit on August 30, 2006 for their Ghent Electrical Generating Station. Comments were received from KU on September 28, 2006 that were numerous and in part requested that the Division revise a portion of the reporting requirements to standardized language recently developed by the Division for power plant permits in general. Additionally, KU cited several instances where the draft permit listed several CAM requirements that were inconsistent with the CAM Plan filed with the original application. The Division's Response to KU's comments is listed in Attachment A to this Statement of Basis. The Division has determined that the original CAM Plan did not provide for the use of a PM-CEMS or account for the different plant stack configurations that will result from the proposed construction of the wet flue gas desulfurization units (WFGD's). On December 11, 2006, KU submitted a revised CAM plan to account for these differences and describes monitoring provisions for interim periods. As a result of this revised CAM document and the comments submitted, significant revisions to the monitoring, recordkeeping and reporting of the draft permit were required. The Division is issuing this permit as Revision 1 to the original Draft permit V-05-043 and affording the public the opportunity to review this draft pursuant to 401 KAR 50:020 Sections 16 and 25 that include:

- Elimination of the Section H – Alternative Operating Scenario; this section originally was included to account for the various operating scenarios that will result from the ongoing construction of the WFGD's. Upon review, it was decided that this section did not actually present operating scenarios but rather listed changes to monitoring and reporting requirements. These changes have now been more clearly stated in Section B on a unit specific basis referencing the revised CAM.
- Incorporation of the Division's standardized language for power plants; this language works well with the monitoring approach proposed by the revised CAM and allows for consistent application and compliance with the permit conditions not just across each unit, but from plant to plant for KU.
- Consolidation of the Material Handling Emission Units on the basis of applicable regulation; the Emission Units for Coal, Limestone, and Gypsum material handling have nearly identical permit conditions when the same regulation is applied. Grouping these units has eliminated unnecessary redundancy, cleared up questions surrounding applicable standards, and aligned the permit more closely with the revised CAM, making the permit easier for compliance and enforcement from a practical matter.

PUBLIC AND AFFECTED STATE REVIEW:

The affected states (Ohio and Indiana) were notified of the issuance of the draft permit on July 24, 2007 via e-mail. On May 23, 2007, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The News Democrat* in Ghent, Kentucky. The public comment period expired 30 days from the date of publication. No states are affected by this permit action.

Comments were received from Louisville Gas and Electric on June 22, 2007. Minor changes were made to the permit as a result of the comments received, however the Division has concluded that the proposed operation will comply with all air quality regulations and requirements. Therefore, the Division has made a final determination to issue a proposed permit. The proposed permit will become final upon approval of the EPA.